

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS ROBERT
CINTRON TO THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
INTERROGATORIES (APWU/USPS-T1-1-2 and 4(a) and (c))
(May 26, 2021)**

The United States Postal Service hereby provides its responses to the American Postal Workers Union, AFL-CIO Interrogatories APWU/USPS-T1-1-2 and 4(a) and (c) to United States Postal Service Witness Cintron, issued on May 19, 2021. APWU/USPS-T1-3 and 4(b) have been redirected to Witness Monteith for response. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony Alverno
Chief Counsel, Global Business & Service
Development

Rory Adams

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1135
(202) 268-8706
Rory.E.Adams@usps.gov
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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CINTRON TO
AMERICAN POSTAL WORKERS UNION INTERROGATORIES**

APWU/USPS-T1-1: Please refer to page 3 of your testimony. You state that the proposed service standard changes “more realistically align[] the Postal Service’s First-Class Mail service standards with the Postal Service’s operational capabilities in light of declining mail volumes and prior network consolidation and rationalization efforts.”

(a) Describe in detail how declining mail volumes do not align with the Postal Service’s operational capabilities in ways other than cost and cost- effectiveness.

RESPONSE:

Declining mail volumes reduce the revenues needed to offset the costs of maintaining a network designed around the current service standards. The Postal Service has not demonstrated a capability of consistently achieving current service standards at the existing performance targets. Declining volumes, although not negatively impacting capability, strengthen the business case to change current service standards.

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APWU/USPS-T1-2: Please refer to page 17, footnote 12 of your testimony. You note that 4% of Election Mail would be affected by these changes.

- (a) Describe in detail the data on which you base your 4% figure.
- (b) Define what types of mail you include in the term "Election Mail".
- (c) Describe the anticipated impact of these changes on Election Mail for voters who are located outside of the United States, including military personnel who are stationed abroad.

RESPONSE:

a. and b. Based on November 2020 general election data and the use of the ballot Service Type ID (STID) in the Intelligent Mail Barcode (IMB), approximately 3.84% of inbound First-Class ballot volume would be impacted by the proposed service standard change.

Adjusted Service Standard Indicator	Piece Count	Impact %
N	22,446,015	96.16%
Y	897,152	3.84%
Grand Total	23,343,167	100.00%

c. Election Mail for voters who are located outside the United States are expected to be impacted according to the national impact summary in Hagenstein's testimony USPS-T-3 at 22.

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APWU/USPS-T1-4: Please refer to page 17, footnote 12 of your testimony. You note that the Postal Service will work with local election officials to help them plan for any impacts from the service standard changes that might affect their Election Mail.

(a) Identify the secretaries of state and the local election boards whose Election Mail may be impacted by the service standard changes.

(b) Describe the timing of the Postal Service's work with local election officials about the service standard changes, particularly those local election officials who will be in an election cycle at the time the service standard changes are implemented.

(c) Describe any operational or business rules regarding Election Mail that will need to be changed or revised to account for the impact of the service standard changes on Election Mail.

RESPONSE:

a. All Election Mail may be impacted by the service standard changes. Based on the prior general election, most ballots would not be affected by the service standard change; however, timing of the mailings and responses would need to be adjusted to account for the smaller percentage of ballots expected to be impacted.

c. No operational or business rules regarding Election Mail will need to change on account of the proposed service standard change. The mailers and public will need to adjust timing based on the service standards to add two days to the previous recommended lead time.